Case 2:20-cv-01315-APG-BNW Document 59 Filed 12/03/20 Page 1 of 5 1 Hardeep Sull SULL AND ASSOCIATES, PLLC 2 520 South Seventh Street, Suite A 3 Las Vegas, NV 89101 Telephone: (702) 953-9500 Fax: (702) 297-6595 4 Dee@sullglobal.com 5 Attorney for Petitioners 6 Jacob B. Lee 7 Nevada Bar No. 012428 Ashlee B. Hesman 8 Nevada Bar No. 012740 STRUCK LOVE BOJANOWSKI & ACEDO, PLC 9 3100 West Ray Road, Suite 300 Chandler, Arizona 85226 Telephone: (480) 420-1600 10 Fax: (480) 420-1695 11 JLee@strucklove.com AHesman@strucklove.com 12 Gina G. Winspear 13 Nevada Bar No. 005552 DENNETT WINSPEAR, LLP 3301 North Buffalo Drive, Suite 195 14 Las Vegas, Nevada 89129 Telephone: (702) 839-1100 15 Fax: (702) 839-1113 16 GWinspear@dennettwinspear.com 17 Attorneys for Respondent Brian Koehn 18 UNITED STATES DISTRICT COURT 19 DISTRICT OF NEVADA 20 21 SANDOR ANIVAL CORDOVA Case No. 2:20-cv-01315-APG-BNW CARBALLO, et al., STIPULATION TO EXTEND DEADLINES 22 Petitioners, AS TO MOTION TO STRIKE AND 23 AMENDED COMPLAINT v. 24 (Fourth Request) WILLIAM BARR, et al., 25 Respondents. 26 27

Pursuant to LR IA 6-1(a) and LR 7-1(a), the parties, through their respective counsel, stipulate and respectfully request that the Court extend the remaining briefing deadlines related to

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the Federal Defendants' Motion to Strike Portions of Amended Complaint (Doc. 52) and Plaintiffs' Amended Complaint (Doc. 51). This is the parties' fourth request to extend the deadlines for Defendants' response to the Amended Complaint and the parties' Stipulated Discovery Plan, and second request to extend the deadlines related to the Motion to Strike. If granted, the new deadlines will be as follows:

- Plaintiff's Response to Motion to Strike: **December 23, 2020**
- Defendants' Reply in Support of Motion to Strike: January 6, 2021
- Defendants' response to Amended Complaint and the parties' Stipulated Discovery
 Plan: 14 days after ruling on Motion to Strike

On September 30, 2020, the Court granted Defendants' Motion to Dismiss in part and dismissed all habeas corpus claims. (Doc. 46.) In that same order, the Court extended Plaintiffs' deadline to amend the Complaint to October 9, 2020. (Id.)

On October 9, 2020, the parties stipulated to extend the deadline for Plaintiffs to file their Amended Complaint, for Defendants to file their response to the Amended Complaint, and for the parties to file their Stipulated Discovery Plan due to Plaintiffs' counsel's family health emergency. (Doc. 47.) The Court granted the Stipulation that same day. (Doc. 48.)

On October 19, 2020, the parties stipulated to extend the deadline for Plaintiffs to file their Amended Complaint, for Defendants to file their response to the Amended Complaint, and for the parties to file their Stipulated Discovery Plan again due to Plaintiffs' counsel's continued family health emergency. (Doc. 49.) The Court granted the Stipulation the next day, on October 20, 2020. (Doc. 50.) As a result of the extension, Plaintiffs' Amended Complaint was due on or before November 2, 2020; Defendants' response to the Complaint and the parties' Stipulated Discovery Plan were due on or before November 20, 2020. (Id.)

On November 2, 2020, Plaintiffs filed their Amended Complaint. (Doc. 51.) Two days later, on November 4, 2020, the Federal Defendants filed a Motion to Strike Portions of Amended Complaint. (Doc. 52.) Plaintiffs' response to the Motion to Strike was due on November 18, 2020. On that date, counsel agreed to seek the instant extensions of the deadlines for Plaintiffs' response

Case 2:20-cv-01315-APG-BNW Document 59 Filed 12/03/20 Page 3 of 5 to the Motion to Strike, Defendants' reply in support of the Motion to Strike, Defendants' response to the Amended Complaint, and the parties' Stipulated Discovery Plan (ECF 55). The Court granted it the next day (ECF 56). On December 2, 2020, Plaintiffs sought a third request for their response to the Motion to Strike Portions of Amended Complaint. Plaintiffs' response is due on December 2,2020 (ECF 56). Plaintiff has dealt with another family health emergency set back Good cause exists to grant the extensions. Plaintiffs' counsel has continued to need to dedicate time to her family health emergency. For these reasons, the parties respectfully request that the Court extend the deadlines as outlined above. DATED this 2nd day of December 2020. SULL AND ASSOCIATES, PLLC By /s/ <u>Hardeep Sull</u> Hardeep Sull 520 South Seventh Street, Suite A Las Vegas, NV 89101 dee@sullglobal.com STRUCK LOVE BOJANOWSKI & ACEDO, PLC E

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By /s/ <i>Jacob Lee</i>	(with permission)
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2	By /s/ Brianna Smith (with permission)	
3	Brianna Smith	
4 5	501 Las Vegas Blvd. So., Suite 1100 Las Vegas, Nevada 89101	
6	<u>Brianna.Smith@usdoj.gov</u> Attorney for Respondents	
7		
8	IT IS SO ORDERED:	
9	Dated: December 3, 2020	
10	ANDREW P. GORDON	
11	UNITED STATES DISTRICT JUDGE	
12		
13		
14	CERTIFICATE OF SERVICE	
15	I hereby certify that on December 2, 2020, I electronically transmitted the attached	
16 17	document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of	
18	Electronic Filing to the following CM/ECF registrants:	
19	STRUCK LOVE BOJANOWSKI & ACEDO, PLC Jacob B. Lee	
20	Ashlee B. Hesman 3100 West Ray Road, Suite 300	
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